

CORRES. CONTROL
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2005 SEP 13 P 2: 17

Department of Energy

CONSPIRACY CONTROL

ROCKY FLATS PROJECT OFFICE
12101 AIRPORT WAY, UNIT A
BROOMFIELD, COLORADO 80021-2583

SEP 08 2005

05-DOE-00542

[illegible]

**Mr. Shaun McGrath, Chair
Rocky Flats Coalition of Local Governments
8461 Turnpike Drive, Suite 205
Westminster, CO 80031**

Dear Mr. McGrath:

This is in response to your letter of August 1, 2005, in which you transmitted a matrix containing the independent verification items that the Rocky Flats Coalition of Local Governments has been tracking. You noted that, of the 49 issues, 29 are closed, and 17 are considered closed pending final documentation. (We will address these 17 items in an updated version of the matrix that we will send under separate cover). Three issues are still considered open by RFCLOG, and you requested formal responses to these.

A summary of these three issues, along with our responses, follow:

1. *Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)-type surveys in areas adjacent to former production buildings-* As RFCLOG is aware, the U.S. Department of Energy, Rocky Flats Project Office (DOE, RFPO) contracted with *The Oak Ridge Institute for Science and Education (ORISE)* to perform an independent verification of surface soil radiological conditions at Rocky Flats. Part of this effort, conducted at the suggestion of RFCLOG's consultant, has been to perform MARSSIM-like surveys in a previously remediated area, the 903 Lip. We chose the 903 Lip because it contained substantial surface plutonium contamination, and was unique in that it had not been covered with soil following remediation. We also believe that the characterization, remediation and subsequent confirmation sampling that took place on the 903 Lip was highly representative of what took place in other areas. The ORISE surveys in this area included systematic (unbiased) soil sampling that indicated conformance with the underlying plutonium soil action level of 50 picoCuries per gram. However, directed (biased) sampling based upon 100% surveys with hand-held detectors revealed small, isolated areas in which the plutonium levels exceeded 50 pCi/g. Subsequent investigation showed these areas to be of very limited extent, and we believe preliminarily they are insignificant from an exposure standpoint. We believe that this validates our remediation and characterization methods, and obviates the need to perform

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additional surveys of this type. Further, and as you point out in your letter, the constantly changing face of the Industrial Area during closure has made it very difficult to find an area where conditions have been sufficiently constant so as to allow for such a survey. Had the ORISE work shown that there were substantial flaws in our characterization or remediation programs, an interruption of the project to conduct these surveys might have been warranted. Given ORISE's results, we disagree with MACTEC and believe additional surveys are unlikely to add useful information.

2 *Information should be provided to validate the DOE position that monitoring is not required for the Lower Hydrostratigraphic Unit (LHSU) at Rocky Flats - - The final Interim Measure/Interim Remedial Action for Groundwater at the Rocky Flats Environmental Technology Site (IM/IRA)* contains an appendix that summarizes the available data on the LHSU, taken mostly from studies performed at the Site in the mid-1990's. A copy is enclosed for your reference. The LHSU is a confining layer of claystone between 600 and 900 feet thick that underlies the entire Site. Vertical groundwater movement is expected to be extremely slow in the LHSU; estimates of the time it would take for water to travel through the claystone layer range from 1,300 to 1.1 million years, providing more than ample time for organic groundwater contaminants to degrade before reaching the regional aquifer. While there is some fracturing and faulting in this layer, these features likely close off at depth, owing to the ductile nature of the claystone. Major ion analysis of shallow groundwater and water from the LHSU show that they possess distinct chemistries, further indicating the separation between the two. In summary, extensive geological investigations into the characteristics of the LHSU have shown that it is an effective confining layer. We believe that monitoring of the LHSU is not warranted given this information.

3. *The ponds should be operated to store storm run-off in Pond A-3 and release smaller batches of water after testing in order to preserve the capacity to collect runoff - -* DOE fundamentally agrees with this recommendation. As we have briefed the RFCLOG Board, we are planning on keeping Pond A-3 operational after closure to help manage runoff. We also agree that maintaining the ponds in a state where they are largely empty is operationally desirable, and the results of our Sitewide water balance studies indicate that this will be the normal condition after closure. That being said, in order to ensure adequate flexibility in pond operations, the DOE does not envision that there will be a specific level (say 20%) when ponds would be automatically discharged. Instead, we would prefer to state this as a general operational goal, which is more consistent with our historical consideration of the multiple factors involved in

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responsible water management. Post-closure pond operations will be described in the Interim Surveillance and Maintenance Plan now being developed by the DOE Office of Legacy Management, and which will be available for public review.

I hope this adequately addresses the issues that you raised. Please contact me at (303) 966-2025, or contact John Rampe of RFPO at (303) 966-6246, if you have any questions or would like to discuss these issues further.

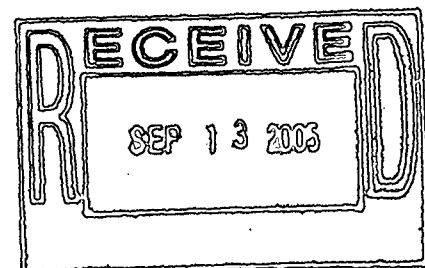
Sincerely,


Frazer R. Lockhart
Manager

Enclosure

cc:

D. Abelson, RFCLOG
K. Korkia, RFCAB
J. Rampe, DOE/RFPO
R. Darr, DOE/LM
D. Shelton, K-H



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